

Kris A. McLean
KRIS A. MCLEAN LAW FIRM, PLLC
315 West Pine Street Missoula,
Montana 59802
Phone: (406) 214-1965
Email: kris@krismcleanlaw.com
Attorneys for Plaintiff

MONTANA SECOND JUDICIAL DISTRICT COURT
BUTTE/SILVERBOW COUNTY

Kevin Washington an individual and minority owner of CryptoWatt Investment Partners, LLC the sole member of CryptoWatt Mining, LLC.

Plaintiff,
v.

Matthew Brent Goetsche, an individual and majority owner of CryptoWatt Investment Partners, LLC the sole member of CryptoWatt Mining, LLC.

Defendant

Dept. 1
Cause No. DV 19-453

**AFFIDAVIT OF
RICHARD B. TABISH**

THE UNDERSIGNED, being of legal age and first duly sworn, does depose and say as follows:

1. I am the President and CEO of FX Solutions, Inc.
2. Since, January 31, 2018, FX Solutions, Inc. has contracted with CryptoWatt Mining, LLC to operate its Bitcoin mining facility at 200 Technology Way, Butte, Montana.
3. The Defendant in this matter, Mr. Matthew Goetsche is presently solely

authorized to and responsible for conducting the financial transactions in Bitcoin and regular currency that funds the operation of CryptoWatt Mining, LLC's Butte facility.

4. Mr. Goetsche is presently incarcerated by federal authorities pending trial on the Indictment attached to Mr. Washington's Complaint in this matter.
5. Mr. Goetsche's unavailability to conduct financial transaction has caused all funding of CryptoWatt Mining, LLC's operations at its Butte facility to cease, resulting in all CryptoWatt Mining, LLC's employees being laid off from their employment. In addition, Mr. Goetsche's unavailability to conduct financial transactions has resulted in approximately \$84,000 in checks to FX Solutions, Inc. to be returned for insufficient funds. These payments from CryptoWatt Mining, LLC to FX Solutions, Inc. were largely designated for the payroll of the 32 employees of FX Solutions, Inc. that work at CryptoWatt Mining, LLC's Butte facility. Mr. Goetsche's unavailability and failure to pay FX Solutions, Inc. for its services has put the jobs of the 32 employees of FX Solutions, Inc. that work at CryptoWatt Mining, LLC's Butte facility in jeopardy.
6. The production of Bitcoin at CryptoWatt Mining LLC's Butte facility requires a contract for electric power to run its Bitcoin mining machines.
7. Mr. Goetsche's unavailability to conduct financial transactions has caused CryptoWatt Mining LLC's electric power contract with Northwest Energy to go into arrears, threatening the continued availability of electric power. Without electrical power for producing Bitcoin at CryptoWatt Mining LLC's Butte

facility, the facility must be shut down, no Bitcoin will be produced and 32 employees of FX Solutions, Inc. will lose their jobs.

8. With an electric power contract in place, CryptoWatt Mining LLC's Butte facility is a very valuable asset, likely worth more than \$40 million. Without an electric power contact in place, the value of CryptoWatt Mining LLC's Butte facility diminishes quickly and drastically. Moreover, every day that CryptoWatt Mining LLC's Butte facility is not operating and producing Bitcoin costs the owners of CryptoWatt Mining LLC approximately 12 Bitcoin-a substantial amount of money depending on the value of Bitcoin on any given day.

FURTHER AFFIANT SAYETH NAUGHT.



Richard B. Tabish

SUBSCRIBED AND SWORN to before me this 23 day of December, 2019.



NOTARY PUBLIC

My Commission Expires:



(NOTARIAL SEAL)

